

DETECTIVE JOSEPH MADER 1/10/2019

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1                   UNITED STATES DISTRICT COURT  
2                   EASTERN DISTRICT OF MISSOURI  
3                   EASTERN DIVISION

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6                   SARAH MOLINA, et al  
7                   vs.  
8                   CITY OF ST. LOUIS, MISSOURI, et al

9

10                  MALEEHA AHMAD, et al  
11                  vs.  
12                  CITY OF ST. LOUIS, MISSOURI

13

14                  Cause No. 4:17-cv-2455-CDP

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16                  DEPOSITION OF DETECTIVE JOSEPH MADER  
17                  TAKEN ON BEHALF OF THE PLAINTIFFS  
18                  January 10, 2019

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25                  (Starting time of deposition: 1:35 p.m.)

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## 8 PLAINTIFF'S EXHIBITS

9	EXHIBIT NUMBER	DESCRIPTION	PAGE	MKD.
10	1	After Actions Report	10	
	2	Training dates	49	
11	3	Aerial photograph from Google	73	
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(Original exhibits were retained by the Court Reporter  
and will be copied and attached to copies of the  
transcript.)

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1 MOLINA, et al are the Plaintiffs and CITY OF  
2 ST. LOUIS, MISSOURI, et al are the Defendants.

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2

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1                   IT IS HEREBY STIPULATED AND AGREED, by and  
2    between counsel for the Plaintiffs and counsel for the  
3    Defendants that this deposition may be taken in  
4    shorthand by Amy A. Victoria, Certified Court  
5    Reporter, and afterwards transcribed into typewriting;  
6    and the signature of the witness is expressly waived.

7                   \*       \*       \*       \*       \*

8                   DETECTIVE JOSEPH MADER,  
9    of lawful age, produced, sworn and examined on behalf  
10   of the Plaintiffs, deposes and says:

11

12                   DIRECT EXAMINATION

13    QUESTIONS BY MR. ROTHERT:

14                  **Q. Good afternoon. Could you please state**  
15   **your name and spell your name for the record.**

16                  A. Joseph Mader, J-O-S-E-P-H, M-A-D-E-R.

17                  **Q. Okay. And is your middle name Bryan --**

18                  A. It is.

19                  **Q. -- B-R-Y-A-N?**

20                  A. Yes, sir.

21                  **Q. My name is Tony Rothert. I am an attorney**  
22   **representing plaintiffs in two cases, and we're doing**  
23   **this deposition in two related lawsuits today. Molina**  
24   **versus City of St. Louis, et al, in which you are a**  
25   **defendant, and Ahmad versus City of St. Louis, in**

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1       **officer during the Women's March in January of 2017?**

2           A.     I would have been in the district by then.

3     I don't recall.

4           **Q.     All right.**

5           A.     It doesn't stand out in my head, no.

6           **Q.     Do you tweet?**

7           A.     Do I tweet?

8           **Q.     Tweet.**

9           A.     No.

10          **Q.    Okay. Do you use Instagram?**

11          A.     No.

12          **Q.    Do you use Facebook?**

13          A.     I have no social media.

14          **Q.    Okay. Do you have My Space?**

15          A.     I do not. Nor do I have Tinder.

16            MR. WHEATON: Does anybody?

17            MR. ROTHERT: Tom, Tom from My Space, I

18     think.

19          **Q.    (Mr. Rothert) All right. Are you familiar**  
20     **at all with the preliminary injunction that was**  
21     **entered by a federal judge in the case Ahmad versus**  
22     **City of St. Louis?**

23          A.     I believe I've discussed that with my  
24     lawyer.

25          **Q.    Other than a conversation with your lawyer,**

1       **are you aware of it?**

2           A.    I think that there was an e-mail sent out  
3    at some point.

4           **Q.    Do you know when that was?**

5           A.    I don't.

6           **Q.    What's your understanding of what it says?**

7           A.    I'd have to read the e-mail again. I mean,  
8    that was sometime ago, if I remember right.

9           **Q.    And would you have done anything  
10   differently on August 19, 2015 if that injunction had  
11   been in place?**

12          A.    Absolutely not.

13          **Q.    How do you know that if you don't know what  
14   it says?**

15          A.    Well, again, it's not like, if what I  
16   remember is right by it, it's not like they were  
17   saying, hey, you know, we're going to allow people to  
18   riot and assault the police. That's not the way that  
19   I read it. I believe it was that they didn't want --  
20   it was something to do with chemicals. Chemical  
21   munitions. I'd have to read the e-mail again.

22            MR. ROTHERT: Okay. I appreciate your  
23   patience today. You have -- I know you've been  
24   deposed before so you probably know this. You have  
25   the right to review the deposition and look it over,